



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 2, 2025

Eric Breeze
Manager of Project Management
Chemring Energetic Devices, Inc.
2525 Curtiss Street
Downers Grove, IL 60515

Reference No. 24-0095

Dear Mr. Breeze:

This letter is in response to your October 16, 2024 phone call and subsequent email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to explosives packaging requirements—specifically—packaging prescribed under an EX-approval. For an approved explosive, you ask whether adding desiccant bags and humidity indicator cards to the interior of the sealed plastic bag (*i.e.*, the inner packaging) affects the classification of the explosive article and whether it needs to be explicitly stated in a packaging note.

No. A new explosive is an explosive produced by a person who has not previously produced that explosive or has made a change in the formulation, design, or process to alter any of the properties of the explosive—see § 173.56(a). It is the opinion of this Office that including desiccant bags and/or humidity indicator cards in the packaging with the article are methods by which a manufacturer can ensure quality control of their products, and do not affect classification of the article provided that their placement does not interfere with any mitigating features of prescribed packaging. Therefore, adding them to a packaging used for transport does not necessitate modifying the packaging note of the existing approval to include reference to use of desiccant bags or humidity indicator cards.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Interpretation Request
Date: Wednesday, October 16, 2024 4:46:48 PM
Attachments: [image001.png](#)
[EX Approval_201822134.pdf](#)

Hello Alice,

Please see the below interpretation request. Let us know if you need anything.

Sincerely,

Janaye

From: Eric Breeze <ebreeze@CED.US.COM>
Sent: Wednesday, October 16, 2024 4:08 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Interpretation Request

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To Whom this may concern,

This attached hazard classification calls out the packaging in the Notes section. My customer has requested that we add desiccant and humidity indicator cards to the packaging, both of which are fully inert packing supplies.

Jonathan from hazmat info center stated that this addition would not have an impact on the hazard class like I expected. He did state that if I wanted a formal answer, to request a letter of interpretation which I would like to proceed with.

Therefore can you please confirm adding these inert supplies to the packaging would not invalidate the shipping classification? I have not accepted my customers request until I confirm I would still be able to ship per EX2018022134. The box size and QTY would stay the same. There is empty space available to add desiccant and humidity indicator card.

Your assistance on this issue is greatly appreciated. Thank you in advance.

Eric Breeze
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